

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re: John Elbert Williams, Jr.  
and  
Stephanie Ann Williams,  
Debtors. } Case No. 09-16327NLJ  
 } Chapter 13

## **MOTION TO MODIFY PLAN**

Debtors John Elbert Williams, Jr. and Stephanie Ann Williams, (herein referred to as "Debtors"), respectfully move the Court to modify their Plan as follows:

- 1 - Treat payments as current through October, 2012.
2. Increase payments to \$1,375.60 monthly beginning October, 2012 through remainder of the *Plan*.

In Support Whereof, Debtors allege:

1. Debtors filed for relief under Chapter 13 of the Bankruptcy Code on November 5, 2012 and Plan was confirmed on March 31, 2010, providing for payment of \$1,160 for six months and \$1,265 monthly for period of 54 months.
2. Due to temporary business slow-downs, Debtors' earnings dropped and payments gradually accrued a delinquency of \$3,165.
3. Debtor's earnings have increased and Debtors continue to make payments required under the *Plan* and for the past two months increased payments by \$200 monthly.
4. By inadvertent oversight, Debtors' counsel failed to file motion to modify

when intended in mid-September, 2012 and therefore this motion is made without request of customary attorney's fee. Debtors have on this date expressed willingness for inclusion of such fee but it is not included to off-set the inconvenience incurred by Debtors and Trustee's office.

5. It appears the proofs of claim timely filed herein before the deadline are materially less numerically than the amounts scheduled for payment in originally proposed *Plan*.
6. Debtors request that their Plan payments be presumed to be current through October, 2012.

/s/ James Branum

James Branum, Attorney for Debtors,  
oba11622, Box 1296, Newcastle, OK 73065  
405/387-9888 fax: 405/387-9888,  
james@branumlaw.com

### **Certificate of Service**

Pursuant to Local Rule 9007(d), I certify that this instrument is served on October 24, 2012 via USPS with 1<sup>st</sup> Class Postage thereupon fully prepaid, addressed to all parties identified on following Exhibit A.

/s/ James Branum

James Branum, oba11622, Attorney for Debtors  
Box 1296, Newcastle, OK 73065 405/387-9888  
888/927-2686 fax: 405/387-3799

Label Matrix for local noticing  
 1087-5  
 Case 09-16327  
 Western District of Oklahoma  
 Oklahoma City  
 Wed Oct 24 22:11:33 CDT 2012

CAMELOT FINANCIAL SERVICES, INC. DBA CHARTER  
 CAMELOT FINANCIAL SERVICES, INC.  
 P. O. BOX 30399  
 MIDWEST CITY, OK 73140-3399

(p) SPRINGLEAF FINANCIAL SERVICES  
 P O BOX 3251  
 EVANSVILLE IN 47731-3251

B-Line, LLC  
 MS 550  
 PO Box 91121  
 Seattle, WA 98111-9221

East Bay Funding, LLC  
 c/o Resurgent Capital Services  
 PO Box 288  
 GREENVILLE, SC 29602-0288

Internal Revenue Service  
 55 N Robinson Stop 5024  
 Oklahoma City, OK 73102-9229

Oklahoma Tax Commission  
 Legal Division  
 120 N Robinson Suite 2000W  
 Oklahoma City, OK 73102-7801

Quantum3 Group LLC as agent for  
 Galaxy Portfolios LLC  
 PO Box 788  
 Kirkland, WA 98083-0788

Roundup Funding, LLC  
 MS 550  
 PO Box 91121  
 Seattle, WA 98111-9221

U.S. Trustee  
 United States Trustee  
 215 Dean A. McGee Ave., 4th Floor  
 Oklahoma City, OK 73102-3444

USBC Western District of Oklahoma  
 215 Dean A. McGee  
 Oklahoma City, OK 73102-3426

5 Star Bnk  
 Po Box 35430  
 Colorado Springs CO 80935-3543

American General Financial Services, Inc.  
 8816 S. Penn, Suite 500  
 Oklahoma City, OK 73159-5242

Asset Acceptance Llc  
 Po Box 2036  
 Warren MI 48090-2036

Auto Finance  
 208 W I-240 Service Rd  
 Oklahoma City OK 73139-8001

C E Wadsack  
 415 W Gray  
 Norman OK 73069-7186

CAMELOT FINANCIAL SERVICES, INC.  
 DBA CHARTER LOAN SERVICE  
 P. O. BOX 30399  
 MIDWEST CITY, OK 73140-3399

Cac Financial Corp  
 2601 Nw Expwy  
 Oklahoma City OK 73112-7236

Cmre Financial Svcs In  
 3075 E Imperial Hwy Ste  
 Brea CA 92821-6753

Enhanced Recovery Corp  
 8014 Bayberry Rd  
 Jacksonville FL 32256-7412

Galaxy Portfolios LLC  
 c/o B-Line LLC  
 MS 550  
 PO Box 91121  
 Seattle WA 98111-9221

Gemb/Jcp  
 Po Box 981402  
 El Paso TX 79998-1402

Hsbc Bank  
 Po Box 5253  
 Carol Stream IL 60197-5253

Internal Revenue Service  
 55 North Robinson  
 Oklahoma City OK 73102-9229

Jefferson Capital Systems LLC  
 PO BOX 7999  
 SAINT CLOUD MN 56302-7999

LVNV Funding LLC  
 Resurgent Capital Services  
 PO Box 10587  
 Greenville, SC 29603-0587

PRA Receivables Management, LLC  
 As Agent Of Portfolio Recovery Assocs.  
 POB 41067  
 NORFOLK VA 23541-1067

Portfolio Recvry&Affil  
 120 Corporate Blvd Ste 1  
 Norfolk VA 23502-4962

Progressive Mgmt Syste  
 1521 W Cameron Ave Fl 1  
 West Covina CA 91790-2738

Quantum3 Group LLC  
 Galaxy Portfolios LLC  
 PO Box 788  
 Kirkland, WA 98083-0788

Stuart Allan & Assoc  
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Tucson AZ 85711-2345

TARGET NATIONAL BANK  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

Tmb - Target  
Po Box 673  
Minneapolis MN 55440-0673

World Acceptance Corp  
830 Nw 12th St  
Moore OK 73160-1709

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2219 West I-240 Service Rd, Ste 108  
Oklahoma City, OK 73159-8251

World Finance Corp  
2219 W I240 Service Rd S  
Oklahoma City OK 73159-8250

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John T. Hardeman  
PO Box 1948  
Oklahoma City, OK 73101-1948

Stephanie Ann Williams  
809 Camelot Drive  
Moore, OK 73160-1509

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

American General Financial Services, Inc.  
7927 N. May Avenue  
Oklahoma City, OK 73120 United States

(d) American General Finance  
8816 S Pennsylvania Ave  
Suite 400  
Oklahoma City OK 73159

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) American General  
1125 SW59th  
Mail Returned-99999

(u) Auto Finance  
1125 SW59th  
Mail Returned-99999

(u) E.R. Soution  
Po Box 97029  
Mail Returned-99999

(d) East Bay Funding, LLC  
c/o Resurgent Capital Services  
PO Box 288  
Greenville, SC 29602-0288

(u) James Hanger  
212 East Vidalway  
Mail Returned-99999

(d) Oklahoma Tax Commission  
Legal Division  
120 N. Robinson, Suite 2000W  
Oklahoma City, OK 73102-7801

(d) Roundup Funding, LLC  
MS 550  
PO Box 91122  
Seattle, WA 98111-9221

End of Label Matrix  
Mailable recipients 40  
Bypassed recipients 7  
Total 47